

1 STEVEN W. MYHRE
2 Acting United States Attorney
District of Nevada

3 PATRICK A. ROSE
4 Nevada Bar No. 5109
Assistant United States Attorney
5 501 Las Vegas Boulevard, South, Suite 1100
Las Vegas, Nevada 89101
Phone: 702-388-6336
6 patrick.rose@usdoj.gov

7 *Attorneys for the United States*

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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 ROMULO ANTONIO PORTILLO,) Case No: 2:17-cv-00394-JAD-CWH
12 Plaintiff,)
13 v.) **MOTION FOR EXTENSION OF TIME**
14 UNITED STATES OF AMERICA,) **(First Request)**
15 Defendant.)
16

17 Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule 6-1 of this
18 Court's Local Rules, the United States moves for an order providing the United States with a
19 fourteen (14) day extension of time, from May 12, 2017 to May 26, 2017, in which to respond
20 to the Complaint in this matter. There have not been any previous requests for such an extension
21 of time.

22 In support of this motion, the United States relies on the Memorandum of Points and
23 Authorities below.

24 Dated: May 11, 2017.

25 DANIEL G. BOGDEN
26 United States Attorney

27 /s/ Patrick A. Rose
PATRICK A. ROSE
28 Assistant United States Attorney

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure 6(b)(1) and Local Rule 6-1 allow a party to request additional time to perform an act. In this case, the United States requests additional time to file a response to the complaint for the reasons set forth below.

Undersigned defense counsel has been, and is currently, out of the office on unexpected leave for a sick child and unable to dedicate the time necessary to complete a response to the complaint. Counsel will also be out of the office one day next week.

Based on these circumstances, the United States requests an extension of time from May 12, 2017 to May 26, 2017, to file a response to the Complaint.

This motion is brought in good faith and not for purposes of undue delay.

Respectfully submitted this 11th day of May 2017.

DANIEL G. BOGDEN
United States Attorney

/s/ Patrick A. Rose
PATRICK A. ROSE
Assistant United States Attorney

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE

DATED: May 15, 2017

1 **PROOF OF SERVICE**

2 I, Patrick A. Rose, certify that the **MOTION FOR EXTENSION OF TIME** was
3 served this date via the Court's Electronic Case Filing system.

4 Dated this 11th day of May 2017.

5 */s/ Patrick A. Rose*
6 PATRICK A. ROSE
7 Assistant United States Attorney